

EXHIBIT 1

From: Naassana, Christine M. CNaassana@wardgreenberg.com
Subject: RE: Boucher, et al. v. Canisius--Confidentiality Agreement
Date: December 20, 2023 at 5:37 PM
To: Daniela Nanau dn@danielananau.com
Cc: D'Antonio, Tom TDAntonio@wardgreenberg.com

Hi Daniela,

Thanks for letting us know your planned timeline. We have no problem with an approach that serves objections and calls for production thereafter, but it would be helpful to have some sense as to when you think you'll produce plaintiffs' responsive documents. Please get back to me on that issue when you can.

In terms of the service of objections, we'll plan to serve ours within a week of receipt of yours, given the week's difference in service of the RFPs. Similarly, we will make defendants' initial production one week after your production.

This also gives us time to get a confidentiality agreement in place. I realize you said you won't need that, but we will. I'll plan to get you the draft of that agreement shortly. Please give me a call if you have any questions. Best wishes for the holidays.

Thank you,
Christine

Christine M. Naassana | WARD GREENBERG HELLER & REIDY LLP

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From: Daniela Nanau <dn@danielananau.com>
Sent: Wednesday, December 20, 2023 4:25 PM
To: Naassana, Christine M. <CNaassana@wardgreenberg.com>
Cc: D'Antonio, Tom <TDAntonio@wardgreenberg.com>
Subject: Re: Boucher, et al. v. Canisius--Confidentiality Agreement

[USE CAUTION: This email originated from outside of the organization]

Hi Christine,

I am going to produce objections and then additional responsive documents in a few weeks. I do not need a confidentiality for my document production.

When do you anticipate producing Defendant's discovery responses?

Thank you.

Daniela

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On Dec 20, 2023, at 3:55 PM, Naassana, Christine M.
<CNaassana@wardgreenberg.com> wrote:

Hi Daniela,

I hope all is well. I know your document production is approaching, and we have not yet discussed a confidentiality agreement. Should I put together a confidentiality agreement? Please let us know.

Thank you,
Christine

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